

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 4:14-CR-00042 RWS-NCC
)	
JILLIAN NICHOLS,)	
)	
Defendant.)	

MOTION TO CONTINUE PRETRIAL PROCEEDINGS

COMES NOW Jillian Nichols, by her attorney, and states to This U.S. Magistrate Court:

1. That pre-trial motions are due on March 11, 2014 and an evidentiary hearing is thereafter docketed for March 24, 2014 at 10:00 a.m.;
2. That more time is needed by counsel for Defendant to privately review and investigate extensive discovery provided to counsel for Defendant. It should be noted that some such discovery provided on CDs appear "blank" or are otherwise incapable of being read with all available office software;
3. That AUSA Goldsmith has been notified and has no objection to extension of three (3) weeks;
4. That, on February 24, This Court ordered that such time for pretrial hearing preparation be excluded pursuant to the Speedy Trial Act, 18USC§3161(h)(7)(A) and (B)(i) and Defendant also executed and filed a separate Waiver of Speedy Trial on the same date.

WHEREFORE, counsel for Defendant prays that This Court continue the pretrial proceedings to March 31, 2014 and thereafter and for such other and further relief as This

Court may deem meet and proper.

Respectfully Submitted,

/s/ Nick A. Zotos

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CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2014, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the attorneys of record and mailed to any non-participating attorneys in Electronic Case Filing.

/s/ Nick A. Zotos
